233339

2011-463-C

windstream.

Windstream NuVox, Inc.
236 West Center Avenue
Mooresville, NC 28115

Jayne Eve
Vice President – External Affairs

704-660-6680
704-664-9644 fax
jayne.t.eve@windstream.com

November 8, 2011

The Honorable Jocelyn Boyd, Chief Clerk
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

> Re: Windstream NuVox, Inc Petition Requesting the Commission's Intervention in Numbering Resources Determination for the Seneca Rate Center

Dear Ms. Boyd:

Windstream NuVox, Inc. ("Windstream") requests a state waiver from the Public Service Commission of South Carolina to grant assignment of their request to the North American Numbering Plan Administrator ("NANPA") for additional numbering resources in the Seneca, SC rate center.

Windstream has a request from a customer for an additional block of 1,000 numbers in the Seneca rate center. The attached request from the customer outlines the purpose and scope of the additional numbers requested. (see Attachment A).

Under existing procedures, to qualify for an additional 1,000 block of numbers, NANPA looks only at the number of Months-To-Exhaust ("MTE") and the utilization requirements established by the FCC and as stated in ATIS' Central Office Code Assignment Guidelines (COCAG). Per section 4.3.1 of the COCAG, the MTE and utilization requirements state a service provider must be 75% utilized in current numbering resources for the rate center and demonstrate that existing codes for the rate center will exhaust within six months.

Windstream NuVox submitted an application on September 9, 2011 for the Seneca rate center (GNVLSCDBDS4) to the Pooling Administrator ("PA") for the purpose of obtaining the additional thousands-block for this specific customer. (see Attachment B). The PA denied the request on September 9, 2011 because Windstream did not meet the MTE criteria nor the utilization criteria (see Attachment C). Even though the MTE Certification Work Sheet shows 3,299 available numbers, there is not a clean thousands-block that can be utilized for this customer.

Windstream respectfully requests the Commission enter an Order granting a state waiver and reversing NANPA's denial of Windstream's request for additional numbering resouces in the Seneca rate center and direct NANPA and/or the PA to assign Windstream an additional thousands-block in the Seneca rate center for the purpose of accomodating the numbering needs of this customer.

Please do not hesitate to contact me at 704-660-6680 if you have any questions or wish to discuss this matter.

Sincerely yours,

Jayne Eve

cc: Nanette Edwards – Counsel, Office of Regulatory Staff

**Oconee County
Information Technology**

Joshua Eaker
Network Administrator

Oconee County Administrative
Offices
415 South Pine Street

Phone: 864.638.1036
Email:
jeaker@oconeesc.com

10/20/2011

To whom it may concern:

Oconee County is in the process of moving our current POTS phone systems to a VOIP solution. With the large amount of published numbers that we have, we would like to acquire a block of 1000 TNs. This will limit the number of changes that will need to be made on websites, in phone books, on business cards, etc. With the current block of TNs that we have, we will have to change several publicized numbers and this always tough on the public. Acquiring a larger block of TNs will greatly reduce the impact that this switchover will how on the public. The additional TNs will also be used in the future, for our desktop faxing systems. We plan to do away with all physical fax machines and implement a fax to/from email systems, greatly reducing the waste of paper.
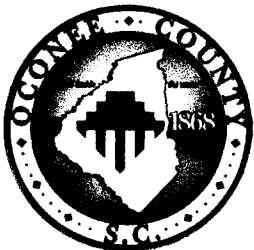
Thank you for your time and consideration.
Joshua Eaker

Attachment B

Thousands-Block Application Form - Part 1A

Tracking   **864-SENECA-SC-**
Number: **479801**
                  Individual Block
                  Request

Type of   ? **Change** ?
Application: ⍟ **New**   i   **Disconnect**

GENERAL APPLICATION INFORMATION

1.1 Contact Information:

Block Applicant:

Company Name:	**NUVOX COMMUNICATIONS**
Headquarters Address:	**4001 Rodney Parham Road**
City, State, Zip:	**Little Rock, AR, 72212-2442**
Contact Name:	**MICHELLE BOWYER**
Contact Address:	**2 N MAIN STREET**

City,State,Zip: **GREENVILLE , SC , 29601**

Phone: **864-** FAX: **864-**   E-mail: **maria.bowyer@windstream.com**
672-5333   **335-5858**

Pooling Administrator: [ii]

Contact Name:	**John Auerbach**
Contact Address:	**1800 Sutter St. Ste. 780**

City,State,Zip: **Concord ,CA,94520**

Phone: **925-363-8706**   FAX: **925-363-7684**

E-mail: **john.auerbach@neustar.biz**

1.2 General Information:

Check one : No LRN needed ___X___ LRN needed [iii] _____

NPA:__**864**__ LATA:____**430**__ OCN: [iv] Parent Company's OCN __**G118**__
                                   8660

Number of Thousands-Blocks Requested :__**1**__

Switching Identification(Switch Entity/POI) : [v]
__**GNVLSCDBDS4**__

City or Wire Center Name :_____   Rate Center: [vi] ____**SENECA**__

Rate Center Sub Zone:_____

1.3 Dates:

Date of Application: vii _   Requested Block Effective Date: viii
09/09/2011   **10/10/2011**

? By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____No ___**X**___

1.4 Type of Service Provider Requesting the Thousands-Block :

a) Type of Service Provider :___**CAP OR CLEC**___(LEC, IXC, CMRS, Other)
b) Primary type of service Blocks to be used for :___**Wireline**___
c) Thousands-Block(s) (NXX-X) assignment Preference (Optional) _____
d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any _____
_____

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.
Growth block for rate center : Yes ___**X**___If Yes , attach months to exhaust worksheet

? By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

     ? OCN:Intra-company ix **?** Switching Id **?** Part 1B

     ? OCN:Inter-company x **?** Effective Date

Change block : Yes _____If Yes , list NPA-NXX-X _____

1.6 Block Return :

a) Is this block Contaminated Yes _____ No _____
b) If Yes how many TNs are NOT available for assignment :_____
c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____If Yes , list NPA-NXX-X _____

Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

MICHELLE BOWYER

Signature of Block Applicant

<u>**CODE**</u>
<u>**ADMINISTRATOR**</u> <u>09/09/2011</u>

Title   **Date**

<u>**Instructions for filling out each Section of the Part 1A form:**</u>

Section 1.1   Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2   Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company.

An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider [xi]. Explanations of these terms may be found in the footnotes.

Section 1.3   The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4   Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5   Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6   Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

<u>**Foot Notes :**</u>

[i] Identify the type of change(s) in Section 1.5.

[ii] The Pool Administrator is available to assist in completing these forms.

[iii] A CO Code application will also need to be submitted to the PA.

[iv] Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

[v] This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

[vi] Rate Center name must be a tariffed Rate Center.

vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

ix Select if you are the current Block Holder.

x Select if you are not the current Block Holder

xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3

May 16, 2008

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level[1]
(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **864-SENECA-SC-479801**

Date: **09/09/2011** OCN:**8660** Company Name:**NUVOX COMMUNICATIONS**

Rate Center: **SENECA**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant:**MICHELLE BOWYER** Signature: **MICHELLE BOWYER**

Title:**CODE ADMINISTRATOR** Telephone No.: **864-672-5333** FAX
No.: **864-335-5858**

E-mail: **maria.bowyer@windstream.com**

A. Available Numbers:**3299**

B. Assigned Numbers: **1980**

C. Total Numbering Resources:**6993**

D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation [2]:**0**

List
Excluded
Code(s) or
Block(s):

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History - Previous 6 months[3]	-13	-10	2	-16	-25	-1						
F. Forecast - Next 12 months[4]	-11	-11	-11	-11	-11	-11	-11	-11	-11	-11	-11	-11

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):**-11.0**

H. Months
to Exhaust[5]
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested	Available Numbers	Months To Exhaust
1	3299	-299.909

I.
Utilization[6] $\frac{\text{Assigned Numbers(B) - Excluded Numbers}}{\text{(D)}}$ X 100 = **28.314**
=
Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: _____

[1]A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

[2]Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

[3]Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

[4]Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

[5]To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

[6]Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Attachment C

November 21, 2003   Attachment 3
ATIS-0300066.at3
                    Pooling Administrator's Response/Confirmation
                                    TBPAG Part 3

Tracking Number :   **864-SENECA-SC-479801**

Date of Application: **09/09/2011**   Effective Date: _____

Date of Receipt: **09/09/2011**   Date of
                                            Response: **09/09/2011**

Service Provider Name: **NUVOX COMMUNICATIONS**

(Telcordia ™ LERG ™   **8660**
Routing Guide) OCN:

NPAC SOA SPID :   _____

Pooling Administrator Contact Information:
John Auerbach   Phone: **925-363-8706**
Signature of Pooling Administrator
John Auerbach   Fax: **925-363-7684**
Name (print)
Email: **john.auerbach@neustar.biz**

    NPA-NXX or NPA-   Block Assigned: _____
___ NXX-X :   _____
                                Block Reserved :   _____
                                Block Reservation
                                Expiration Date :   _____
                                Block/Code Modified : _____
                                Block/Code
                                Disconnected :   _____

    Block Contaminated(Yes or No) :   _____
    If Yes,enter the number of TNs
    contaminated :   _____
    Switch Identification(Switch Entity/POI): [1]   **GNVLSCDBDS4**
    Rate Center: **SENECA**
    Rate Center Sub Zone: _____

X
___ **Form Complete, request denied.**

    Explanation:
    **DR-57: You do not meet the MTE and/or Utilization requirements,
    therefore this request for a new block is denied. You may proceed with
    requesting a State Waiver from the appropriate state commission using
    this Part 3 denial. If you are in disagreement with the disposition of this
    request, please refer to the Thousands-Block Number (NXX-X) Pooling
    Administration Guidelines for the appeals process.**

___ **Request withdrawn.**
    Explanation:

___ **Assignment activity suspended by the administrator.**
    Explanation:

Remarks:

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[1] This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI ™ Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)